

UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

JOE H. BRYANT, JR.

PLAINTIFF

v

CAUSE NO: 3:05-cv-179 TSL

MISSISSIPPI MILITARY DEPARTMENT et al

DEFENDANT

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ANSWER TO AMENDED COMPLAINT

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The defendant Earl Pierce hereby answers the allegations made against him in the amended complaint as follows:

1. Denied.
2. Admitted.
3. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.
4. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.
5. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.
6. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.
7. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.
8. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

9. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

10. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

11. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

12. The defendant admits that he is a resident of Union, Mississippi, and that he is a commissioned officer in the Mississippi Air National Guard. All other allegations of paragraph 12 are denied.

13. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

14. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

15. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

16. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

17. The allegations in this paragraph relate to other defendants and do not require Earl Pierce to admit or deny any allegation.

18. Denied.

19. Denied.

20. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

21. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

22. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

23. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

24. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

25. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

26. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

27. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

28. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

29. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

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31. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

32. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

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44. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

45. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

46. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

47. The defendant Earl Pierce cannot admit or deny these allegations and therefore denies them.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

61. Denied.

62. Denied.

63. Denied.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

68. Denied.

69. Denied.

70. Denied.

71. Denied.

72. Denied.

73. Denied.

74. Denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. The defendant Pierce denies that the plaintiff is entitled to any of the relief requested in his demand for relief.

#### **AFFIRMATIVE DEFENSES**

Now having fully answered all of the allegations made against him, the defendant Pierce asserts the following affirmative defense.

80. The complaint fails to state a claim upon which relief can be granted.

Dated: December 28, 2005.

Respectfully submitted,

/s/ Michael Farrell

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on 12/28/05 I have electronically filed a true and correct copy of the foregoing pleading with the Clerk of the Court using the ECF system which sent notification to such filing to the following:

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/s/ Michael Farrell  
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